

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
Legacy IMDBS, Inc., <i>et al.</i> , ¹	Case No. 23-10852 (KBO)
Debtors.	Jointly Administered
Synacor, Inc.,	
Plaintiff,	Adversary Proceeding No. 23-50753 (KBO)
v.	
IV Media, LLC; Innovation Ventures, LLC; Portal Acquisition Co.; iMedia Brands, Inc.; ValueVision Interactive, Inc.; VVI Fulfillment Center, Inc.; ValueVision Retail Inc.; JWH Acquisition Company; PW Acquisition Company, LLC; EP Properties, LLC; FL Acquisition Company; Norwell Television, LLC; 867 Grand Avenue, LLC; and Unidentified Parties, 1-25,	
Defendants.	

**CERTIFICATION OF COUNSEL REQUESTING ENTRY OF ORDER
APPROVING SECOND STIPULATION FOR FURTHER EXTENSION OF
TIME TO RESPOND TO COMPLAINT FOR DECLARATORY JUDGMENT**

The undersigned counsel to Defendants IV Media, LLC and Innovation Ventures, LLC
(together, the “Defendants”) in the above-captioned adversary proceeding hereby certifies that:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); Legacy IMBDS, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors’ service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

1. On November 1, 2023, Plaintiff Synacor, Inc. (“Plaintiff”) filed its *Complaint for Declaratory Judgment* [Adv. Docket No. 1] (the “Complaint”) initiating this adversary proceeding.

2. On December 6, 2023, Plaintiff and Defendants entered into a *Stipulation for Extension of Time to Respond to Complaint for Declaratory Judgment*, which is filed at Adv. Docket No. 8, and extended the time for Defendants to respond to the Complaint through and including January 4, 2024.

3. On January 5, 2024, the Court entered the *Order Approving Stipulation Extending Time to Answer or Respond to Complaint* [Adv. Docket No. 19] extending the time for Defendants to respond to the Complaint through and including January 11, 2024.

4. As a result of ongoing settlement discussions between the parties, Plaintiff and Defendants have agreed to a further extension of Defendants’ time to respond to the Complaint through and including January 19, 2024, as memorialized in *Second Stipulation for Further Extension of Time to Respond to Complaint for Declaratory Judgment* (the “Stipulation”), a copy of which is attached as Exhibit 1 to the proposed order attached hereto.

5. Pursuant to Del. Bankr. L.R. 7012-2, the parties seek entry of an order approving the Stipulation.

6. Defendants therefore request that the Court enter the proposed order attached hereto as Exhibit A at its earliest convenience. Counsel is available at the request of the Court.

Dated: January 10, 2024
Wilmington, Delaware

Respectfully submitted,

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)
222 Delaware Avenue, Suite 1600
Wilmington, Delaware 19801
Telephone: (302) 661-7000
Facsimile: (302) 661-7360
Email: melorod@gtlaw.com

Counsel for the Defendants

EXHIBIT A

EXHIBIT 1